



Dennis Lueck Jr.

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March 5, 2024

**VIA CM/ECF**

Hon. Wendy Beetlestone  
U.S. District Judge, Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106-1797

**Re: *Misty Hernandez v. NewRez LLC d/b/a Shellpoint Mortgage Servicing*  
Case No. 2:23-cv-03569-WB  
Unopposed Request for Extension of Time to Respond to Complaint**

Dear Judge Beetlestone:

Akerman LLP represents defendant NewRez LLC d/b/a Shellpoint Mortgage Servicing (**Shellpoint**) in this putative class action alleging violations of the Real Estate Settlement Procedures Act as well as the Fair Credit Reporting Act. We respectfully request a ten-day extension to Shellpoint's deadline to oppose Ms. Hernandez's motion to strike Shellpoint's offer of judgment (ECF No. 32).

Shellpoint's deadline to oppose Ms. Hernandez's motion is **March 12, 2024**. This requested extension would make Shellpoint's deadline to oppose **March 22, 2024**. The extension will allow the parties time to continue settlement discussions before Magistrate Judge Richard A. Lloret.

This request is made in good faith and is not for the purpose of obstruction or delay. We sought plaintiff's consent to this request, and plaintiff does **not** oppose the requested extension.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ *Dennis Lueck Jr.*  
Dennis Lueck Jr.

CCF/npf

cc: Patrick Howard, Esq. (by ECF)  
Scott David Hirsch, Esq. (by ECF)  
David A. Goodwin, Esq. (by ECF)  
Jessica L. Kerr, Esq. (by ECF)

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